

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL  
SOUTHERN ZONE BENCH AT CHENNAI  
APPLICATION NO. 234 OF 2017**

**IN THE MATTER OF:**

**MEENAVA THANTHAI K.R.SELVARAJ KUMAR  
MEENAVAR NALA SANGAM**  
Represented by its President,  
M.R.Thiyagarajan

**...Applicant**

**Versus**

**UNION OF INDIA & ORS**

**...Respondents**

**SUBMISSIONS AND OBJECTIONS TO THE JOINT COMMITTEE  
REPORT**

1. The Applicant has filed the above tilted application in order to highlight about the unauthorised and unscientific large-scale export operation of Sea Food Production, Processing and Preservation, established and run by Respondent No.12 without obtaining the CRZ Clearance as well as consents from the statutory authorities under the provisions of CRZ Notification 2011, Air(Prevention and Control of Pollution)Act,1981 and Water(Prevention and Control of Pollution)Act,1971. Despite to the above, the Respondent No.12 has constructed the commercial building of two floors in the impugned site of CRZ without obtaining the CRZ Clearance from the Tamil Nadu Coastal Zone Management Authority as well as other statutory permissions from the authorities.
2. Before traversing into the report of the committee, the Applicant would like to highlight about the significant grounds raised in the application in seriatim-wise for the convenience of this Hon'ble Tribunal:-

1. ***CRZ Clearance has not been obtained by the Respondent No.12 for the construction of commercial building ie. two floors in the CRZ Zone.***
2. ***CRZ Clearance has not been obtained by the Respondent No.12 for the operation of Production, Processing and preservation of sea foods in the impugned site of CRZ.***
3. ***Consent to Establish and Operate have not been obtained by the Respondent No.12 for the said activity.***
4. ***No Effluent Treatment plant erected by Respondent No.12 to treat the effluents.***
5. ***Discharging and Dumping of solid and liquid effluents directly into the sea.***
6. ***Illegal Drawl of Ground water in the impugned site***

**BRIEF OUTLINE OF RESPONDENT NO.12(ST.PETER AND PAUL SEA FOODS PRIVATE LIMITED):-**

3. The Respondent No.12 herein is a company incorporated under the Companies Act 1956, for the large-scale export business of Production, Processing and Preservation of sea food in the impugned site of CRZ in the year 1961 and formally registered in the year,2007(Year of Establishment shown in the website of Respondent No.12 which is appended in the present objection) under the name and style of St.Peter and Paul sea foods Exports Private Limited with the authorised capital and paid capital of 12,00,0000/- (Rupees Twelve Crore). In this regard, the Applicant would like to submit that the website ([www.peterspaulseafood.com](http://www.peterspaulseafood.com)) as well as the recent Annual Returns submitted and filed by the Respondent No.12 under the provisions of Companies Act apparently reveals that the project proponent is still carrying

out the illegal activities in the impugned site of CRZ without adhering to the Environmental Norms.

**Screen Shots of the website of Respondent No.12 and Incidental Documents relied upon by the Applicant is Annexed herewith as Annexure-A/1**

**OBJECTIONS TO THE COMMITTEE REPORT:**

4. The Applicant humbly submits that this Hon'ble Tribunal by an order dated 27.01.2021 was pleased to appoint a Joint committee to look into the allegations raised by the Applicant and directed to file a report in the matter. Thereafter, the Joint Committee has filed two reports before this Hon'ble Tribunal by imposing an Environmental Compensation of Rs.30,00,000/- (Rupees Thirty Lakhs) after confirming the allegations raised by the applicant in the present application. While doing so, the Joint Committee has overlooked few significant grounds raised in the Application and failed to ascertain the compensation without considering the facts of the case in proper perspective. Therefore, the Applicant humbly seeks the permission of this Hon'ble Tribunal to raise the legal and factual objection against the committee findings in the matter.

**ENVIRONMENTAL COMPENSATION IS SCANTY AND NOT CONSIDERED THE DAMAGE CAUSED TO THE COASTAL ECO SYSTEM- PRINCIPLES OF POLLUTER PAYS AND SUSTAINABLE DEVELOPMENT IGNORED BY THE JOINT COMMITTEE.**

5. The Applicant humbly submits that the environmental compensation imposed by the joint committee is very lesser and not considered the grave violations and damages caused to the coastal eco system in entirety. In this regard, it is vital to submit that the own website of Respondent No.12 would

reveals that the project proponent had commenced the said activity in the year 1961 and registered in the year.2007 in the impugned site of the CRZ zone. But, it is shock and surprise that the joint committee has imposed an environmental compensation on the violator only for the period of one year ie. From the date of inspection to the date of Disconnection of Electricity (28.09.2017 to 14.08.2018).

6. The Applicant further submits that the Respondent No.12 is still continuing the illegality in the impugned site by causing grave damages to the coastal eco system. To substantiate the aforesaid contention, the Applicant has produced the Annual return for the financial year:2019-2020 submitted and filed by the Respondent No.12 under the provisions of Companies Act that reveals that the impugned site is acting as a registered place for the said activities of the company. Further, it is pertinent to state that the Joint committee has also observed that the impugned site is used for the accommodation of the employees of Respondent No.12 and thus, the impugned site is still considered as working place of the Respondent No.12 under the eyes of law.
7. The Applicant humbly submits that the committee in its report dated 14.09.2021 has categorically stated that the electricity connection has been disconnected by the Authorities on 14.08.2018. But, in the same report it was also observed by the committee (unnumbered Page No.3, Para.2.2. under the head of status of the unit) that the employees of the Respondent No.12 are using the premises for the accommodation purpose, which is illogical and suspicious. Therefore, it is evident that the electricity connection has not been fully disconnected by the authorities as contemplated in the report and the same has been used by the Respondent No.12 for the said activities and thus, the violations are still continuous.

8. The Applicant further submits that the Joint committee has not considered the bundle of violations committed by the Respondent No.12 and failed to consider the damages towards the coastal ecosystem including the livelihood of the Fishermen's in the course of ascertaining the Environmental Compensation. Therefore, the Applicants humbly prays that this Hon'ble Tribunal to impose exemplary environmental compensation on Respondent No.12 including the cost for restoration of coastal eco system under the Principles of Polluter Pays and Sustainable Development.

In the case of **Bajri Lease Loi Holders Welfare Society Versus State of Rajasthan and Others, 2021 SCC OnLine SC 1043**, The Hon'ble Supreme Court held that:

***The "Polluter Pays" principle as interpreted by this Court means that the absolute liability for harm to the environment extends not only to compensate the victims of pollution but also the cost of restoring the environmental degradation. Remediation of the damaged environment is part of the process of "Sustainable Development" and as such the polluter is liable to pay the cost to the individual sufferers as well as the cost of reversing the damaged ecology.***-(Para.16)

In **M.C. Mehta v. Kamal Nath, [(2002) 3 SCC 653 : AIR 2002 SC 1515.]** the Supreme Court held: "Pollution is a civil wrong. By its very nature, it is a tort committed against the community as a whole. A person, therefore, who is guilty of causing pollution, has to pay damages (compensation) for restoration of the environment and ecology. He has also to pay damages to those who have suffered loss on account of the act of the offender. The powers of this Court under Article 32 are not restricted and it can award damages in a PIL or a writ petition as has been held in a series of decisions. In addition to damages aforesaid, **the person guilty of causing pollution can also be held liable to pay**

**exemplary damages so that it may act as a deterrent for others not to cause pollution in any manner.**

*In the case of Sterlite Industries (India) Ltd. v. Union of India, (2013) 4 SCC 575:* To the effect that compensation must be deterrent having regard to paying capacity and magnitude of the polluter..

*In the case of Ganga Goel Vs. Union of India, (2018) 18 SCC 257* the Hon'ble Supreme Court has imposed environmental Compensation of Rs.100 crores or 10 percent of the project cost whichever is higher for the restoration and restitution of environment damages and degradation caused by the project proponent by carrying out the construction activities without the necessary clearance.

**ILLEGAL CONSTRUCTION HAS NOT BEEN DEMOLISED BY THE AUTHORITIES: NON-COMPLIANCE OF THIS HON'BLE NGT ORDERS**

- 9. The Applicant humbly submits that the report of the Joint Committee has clearly stated that the Respondent No.12 has constructed two commercial floors in the CRZ area by intentionally violating the provisions of the CRZ Notification,2011 in so far as they have not obtained CRZ clearance and other statutory permissions from any of the authorities.
- 10. Even after considering the reports of the committee this Hon'ble Tribunal has directed the Respondents especially the Coastal Zone Management Authority and District collector to initiate action by way of demolishing the illegal structures constructed by the Respondent No.12. But, hitherto, no actions/demolition initiated by the official respondents for the compliance of this Hon'ble Tribunal orders.

In the case of **The Kerala State Coastal Zone Management Authority Vs. The State of Kerala Maradu Municipality & Ors.** and in the case of **Indian Council for Enviro-Legal Action Vs. Union of India** the Hon'ble Apex Court held that the construction made in CRZ-III zone without getting prior permission from the authorities under the said notification is illegal and the same is liable to be demolished. It is further observed therein, that the notification issued under the Environment (Protection) Act, 1986 is meant to protect the environment and bring about sustainable development. It is the law of the land and it is meant to be obeyed and enforced. As held by the Apex Court, constructions in violation of the CRZ Regulations are not to be viewed lightly. In that case, construction made without permission was directed to be demolished.

In the case of **M.K. Ranjitsinh vs Union Of India 2021 SCC OnLine SC 326** the Hon'ble Supreme court held that :-

*"Sustainable development, it has been argued by various eminent environmentalists, clearly postulates an anthropocentric bias, least concerned with the rights of other species which live on this earth. Anthropocentrism is always human interest focussed thinking that non-human has only instrumental value to humans, in other words, humans take precedence and human responsibilities to nonhuman are based on benefits to humans. **Ecocentrism is nature centred, where humans are part of nature and nonhumans have intrinsic value. In other words, human interest does not take automatic precedence and humans have obligations to nonhumans independently of human interest. Ecocentrism is, therefore, lifecentred, nature centred where nature includes both humans and nonhumans.***

...

**The State as well as the Central Government therefore, have a duty cast to preserve the endangered species and as such the expenses incurred will**

have to be provided by them either under the schemes available or by earmarking the same in such manner."

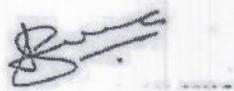
**ALLEGATION REGARDING DRAWL OF GROUND WATER IN THE CRZ ZONE HAS NOT BEEN CONSIDERED BY THE COMMITTEE IN THE REPORT-DRAWL OF GROUND WATER IS A PROHIBITED ACTIVITY IN THE IMPUGNED SITE**

11. The Applicant humbly submits that the report of Joint committee is silent about the extraction of ground water in the impugned site of CRZ by the Respondent No.12. The aforesaid issue is one of the significant grounds raised by the applicant in the present application. In this regard, it is to submit that the Respondent No.12 has sunken several illegal bore wells in the crz zone for the purpose of the Production, Processing and Preservation of Sea food by violating the provisions of CRZ Notification.

In view of the above submissions and documents relied on by the Applicant, it is humbly prayed that this Hon'ble Tribunal may be pleased to:

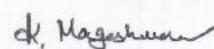
- I. Demolish the illegal structures constructed by the Respondent No.12 in the CRZ area for not obtaining CRZ Clearance and other statutory permissions from the Authorities.
- II. Impose exemplary compensation on Respondent No.12 for an intentional damage caused to the coastal ecosystem including the livelihood of the fishermen in the vicinity.
- III. Direct the concern Respondents to penalise the officials who have allowed the illegal constructions and activities in the impugned site from the year.1961.

**Dated at Chennai on this 05<sup>th</sup> day of December,2021**



**G.STANLY HEBZON SINGH**

**Filed by**



**K.MAGESHWARAN**

**ADVOCATES**



## WELCOME TO ST PETER & PAUL SEA FOODS EXPORTS



### DIRECTORS WELCOME NOTE:

It's my immense pleasure to welcome you to our website

St.Peter & Paul entered into the origin of sea food in 1961. Formally registered in 2007 with the support and guidance of Mr.Muraies, our parent (father?), dedicated and committed in upbringing the present Directors of the company. Through his will power we were instigated to start the institution and developed as St.Peter & Paul Private Limited.

We are four Directors and each of us are responsible for the various branches of the organisation. The unity and the commitment of our Directors coupled with the eminent support of our employees have made everything possible to reach where we are today.

Our motive is to prove "We are your 'virtual' sea food supplier." We hold integrity as paramount of our business and technical activities.

The profile provides an overview of our Plant, Products, Resources and our Business activities.

We clinch into the Global sea food consumer markets all over the World with our desirable quality products that meet the consumer's requirement in accord to the seasons. As a Group of Companies, we will be able to offer a complete package consisting of "Consistency, comprehensive range of high quality, reasonable pricing, variety of products, timely delivery, competitive and capability in volume of Supply"

We honestly believe that all those who visit this website will find it very informative and useful.

We once again thank you for your gracious time and interest in "St. Peter & Paul Group of Companies"

M.JosephJagan Managing Director.



# Regd Office No 11-A, New Thiruvalluvar Nagar, Kasimedu, Royapuram Chennai - 600 013, Tamilandu, India.

044 2597 1788

info@peterpaulseafood.com

www.peterpaulseafood.com

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Resources

- We envy our supply chain management right from procurement, processing & timely delivery of raw materials for Exports and for supply for local markets.
- **Fishing area:** We have fish landing area in the fishing harbour allotted by Chennai Port Trust. The entire Tuna lands in this shed; after basic cleaning, they are sent to our unit for further processing.
- **Boats:** Presently we own a dozen boats and more than 100 boats are leased by us. The catch which is suitable for export will be sent to our processing plant directly and other catch will be supplied to the local market of Tamil Nadu and Kerala.
- We have a dedicated team of workers who manage our fleet of boats. We provide them with all necessary supports for fishing activities.
- **Transport/Trailers:** We have nearly 40 insulated vehicles and 6 trailers which are being used for transportation of raw material and Reefer Containers for exports.
- **Ice Plant:** We have three Ice Plant of our own. The manufactured ice is used for our own boats for preserving the raw materials. Our plant has a capacity to produce 1446 blocks. We have 4 vehicles operating for despatching ice for boats and for our sheds. We function 24\*7 with support of 25 contractual staff.
- **Local Market:** We have a strong local market base in Tamil Nadu and Kerala. Our quality, competitive price and promptness in delivery are highly appreciated by the vendors. The local market distribution is taken care by our own vehicles. Our local market functions early morning every day.
- **Shed:** We have two peeling shed out of which one is situated very close to fishing harbour. All raw materials are segregated, peeled and sent for export to factory for further processing and to the local market for sales. One of our shed is purely maintained for Tuna. This shed is located in the fishing harbour allotted by Chennai Port.



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About Us

- Our Vision: To supply superior quality products and delight our valuable buyers / Consumers/customers.
- Our Mission: To satisfy & fulfil vendors and employees.
- We are a registered Private Limited Company having a Team of skilled professionals and technicians with rich knowledge in Sea Food Processing, Packing, Storage and Export.
- Processing Unit:** Our unit is situated at Periyapalayam, in Thiruvalluvar District, Chennai, East coast of India. The Processing unit is operating in 2 Acres Land with facilities of 5 Blast freezers and 4 Plate Freezers which can freeze about 105 tons per day. We have 3 Cold Storage units and 2 chill Rooms with a capacity of 1300 & 125 Tons respectively. The company owns fleet of boats, 40 Insulated Vehicles , refrigerated trucks and Six Trailers for efficient transportation of raw material and finished products.
- Resources:** We are growing with the continued support of our Global Customers from **European Union Countries, United State, United Arab, Vietnam & Yemen.** We are also suppliers to our domestic market in Southern Region under the banner of "Royes".
- The Plant is approved by EU with necessary registration certificates from government and statutory authorities. The company has obtained MPEDA approval as a manufacturing exporter. Company has also obtained FDA registration required for export of goods to USA. The company is in the process of obtaining "STAR TRADING HOUSE" status.
- Export:** We have our own Ice Plant, insulated Vehicles, fleet of boats, Trailers, Peeling sheds and Processing Unit.
- Local Market:** We operate sale of fish in local market in Tamil Nadu and Kerala. We have attracted the vendors of our local market through our fresh products, reasonable prices and timely delivery.



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ANNEXURE I					
FORM NO. MGT 9					
EXTRACT OF ANNUAL RETURN					
as on financial year ended on 31.03.2020					
Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014.					
I	REGISTRATION & OTHER DETAILS:				
i	CIN	U05000TN2011PTC080387			
ii	Registration Date	30/04/2011			
iii	Name of the Company	ST. PETER & PAUL SEA FOOD EXPORTS PRIVATE LIMITED			
iv	Category/Sub-category of the Company	Company limited by Shares			
v	Address of the Registered office & contact details	11A, NEW THIRUVALLUVAR NAGAR, KASIMEDU, ROYAPURAM, CHIENNAI-600013, msajegan@gmail.com			
vi	Whether listed company	Unlisted			
vii	Name, Address & contact details of the Registrar & Transfer Agent, if any.	NA			
II	PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY				
	All the business activities contributing 10% or more of the total turnover of the company shall be stated				
Sl.No	Name & Description of main products/services	NIC Code of the Product/service	% to total turnover of the company		
1	Producing, Processing and Preservation Seafoods	10209	89.50%		
III	PARTICULARS OF HOLDING, SUBSIDIARY & ASSOCIATE COMPANIES				
Sl No	Name & Address of the Company	CIN/GLN	HOLDING/SUBSIDIARY/ASSOCIATE	% OF SHARES HELD	APPLICABLE SECTION
NOT APPLICABLE					



IV Category of Shareholders	SHAREHOLDING PATTERN (Equity Share capital Break up as % to total Equity)								
	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
<b>A. Promoters and Promoters group</b>									
<b>(1) Indian</b>									
a) Individual/HUF	-	6,000,000	6,000,000	50%	-	6,000,000	6,000,000	50%	0%
b) Central Govt. or State Govt.	-	-	-	-	-	-	-	-	-
c) Bodies Corporates	-	-	-	-	-	-	-	-	-
d) Bank/ FI	-	-	-	-	-	-	-	-	-
e) Any other (Firms)	-	6,000,000	6,000,000	50%	-	6,000,000	6,000,000	50%	0%
<b>Sub Total: (A) (1)</b>	-	12,000,000	12,000,000	100%	-	12,000,000	12,000,000	100%	0%
<b>(2) Foreign</b>									
a) NRI- Individuals	-	-	-	-	-	-	-	-	-
b) Other Individuals	-	-	-	-	-	-	-	-	-
c) Bodies Corp.	-	-	-	-	-	-	-	-	-
d) Banks/ FI	-	-	-	-	-	-	-	-	-
e) Any other...	-	-	-	-	-	-	-	-	-
<b>Sub Total: (A) (2)</b>	0	0	0	0%	-	0	0	0%	0%
<b>TOTAL A = (A (1) + A (2))</b>	0	12,000,000	12,000,000	100%	-	12,000,000	12,000,000	100%	0%
<b>B. Public Shareholding</b>									
<b>(1) Institutions</b>									
a) Mutual Funds	-	-	-	-	-	-	-	-	-
b) Banks/ FI	-	-	-	-	-	-	-	-	-
c) Central govt	-	-	-	-	-	-	-	-	-
d) State Govt.	-	-	-	-	-	-	-	-	-
e) Venture Capital Fund	-	-	-	-	-	-	-	-	-
f) Insurance Companies	-	-	-	-	-	-	-	-	-
g) FII's	-	-	-	-	-	-	-	-	-
h) Foreign Venture Capital Funds	-	-	-	-	-	-	-	-	-
i) Others (specify)	-	-	-	-	-	-	-	-	-
<b>Sub Total (B)(1):</b>	0	0	0	0	0	0	0	0	0
<b>(2) Non Institutions</b>									
a) Bodies corporates	-	-	-	-	-	-	-	-	-
i) Indian	-	-	-	-	-	-	-	-	-
ii) Overseas	-	-	-	-	-	-	-	-	-
b) Individuals	-	-	-	-	-	-	-	-	-
i) Individual shareholders holding nominal share capital upto Rs.1 lakhs	-	-	-	-	-	-	-	-	-
ii) Individuals shareholders holding nominal share capital in excess of Rs. 1 lakhs	-	-	-	-	-	-	-	-	-
c) Others (specify)	-	-	-	-	-	-	-	-	-
<b>Sub Total (B)(2):</b>	0	0	0	0.00	0	0	0	0.00	0%
<b>TOTAL (B) = (B)(1) + (B)(2)</b>	0	0	0	0.00	0	0	0	0.00	0%
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>									
	-	0	0	0	0	0	0	0	0%
<b>GRAND TOTAL (A+B+C)</b>	0	12,000,000	12,000,000	100%	0	12,000,000	12,000,000	100%	0%



(i) SHARE HOLDING OF PROMOTERS								
Sl. No	Shareholders Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in share holding during the year
		No. of shares	% of total shares of the company	% of shares pledged encumbered to total shares	No. of shares	% of total shares of the company	% of shares pledged encumbered to total shares	
1	M. Joseph Jegan	2,968,400	24.74%	-	2,968,400	24.74%	-	0.00%
2	M. Joseph Jegan (On behalf of M/s. St. Peter & Paul)	2,500,000	20.83%	-	2,500,000	20.83%	-	0.00%
3	M. Joseph Jegan (On behalf M/s. Allied Exim Foods)	1,250,000	10.42%	-	1,250,000	10.42%	-	0.00%
4	M. Mohan	1,235,000	10.29%	-	1,235,000	10.29%	-	0.00%
5	M. Mohan (On behalf M/s. St. Peter & Paul)	500,000	4.17%	-	500,000	4.17%	-	0.00%
6	M. Mohan (On behalf M/s. Allied Exim Foods)	250,000	2.08%	-	250,000	2.08%	-	0.00%
7	M. Muraies	825,000	6.88%	-	825,000	6.88%	-	0.00%
8	M. Byju	671,600	5.60%	-	671,600	5.60%	-	0.00%
9	M. Byju (On behalf M/s. St. Peter & Paul)	500,000	4.17%	-	500,000	4.17%	-	0.00%
10	M. Byju (On behalf M/s. Allied Exim Foods)	250,000	2.08%	-	250,000	2.08%	-	0.00%
11	M. Anees	300,000	2.50%	-	300,000	2.50%	-	0.00%
12	M. Anees (On behalf M/s. St. Peter & Paul)	500,000	4.17%	-	500,000	4.17%	-	0.00%
13	M. Anees (On behalf M/s. Allied Exim Foods)	250,000	2.08%	-	250,000	2.08%	-	0.00%
	<b>Total</b>	<b>12,000,000</b>	<b>100.00%</b>	<b>-</b>	<b>12,000,000</b>	<b>100.00%</b>	<b>-</b>	<b>0.00%</b>

(ii) CHANGE IN PROMOTERS' SHAREHOLDING (SPECIFY IF THERE IS NO CHANGE)					
Sl. No.	Name of promoter	Share holding at the beginning of the Year		Cumulative Share holding during the year	
		No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
1	M Joseph Jegan				
	At the beginning of the year	2,968,400	24.74%	2,968,400	24.74%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	2,968,400	24.74%	2,968,400	24.74%
2	M. Joseph Jegan (On behalf of M/s. St. Peter & Paul)				
	At the beginning of the year	2,500,000	20.83%	2,500,000	20.83%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	2,500,000	20.83%	2,500,000	20.83%



Sl. No.	Name of promoter	Share holding at the beginning of the Year		Cumulative Share holding during the year	
		No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
3	M. Joseph Jegan (On behalf M/s. Allied Exim Foods)				
	At the beginning of the year	1,250,000	10.42%	1,250,000	10.42%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	1,250,000	10.42%	1,250,000	10.42%
4	M. Mohan				
	At the beginning of the year	1,235,000	10.29%	1,235,000	10.29%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	1,235,000	10.29%	1,235,000	10.29%
5	M. Mohan (On behalf M/s. St. Peter & Paul)				
	At the beginning of the year	500,000	4.17%	500,000	4.17%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	500,000	4.17%	500,000	4.17%
6	M. Mohan (On behalf M/s. Allied Exim Foods)				
	At the beginning of the year	250,000	2.08%	250,000	2.08%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	250,000	2.08%	250,000	2.08%
7	M. Murales				
	At the beginning of the year	825,000	6.88%	825,000	6.88%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	825,000	6.88%	825,000	6.88%
8	M. Byju				
	At the beginning of the year	671,600	5.60%	671,600	5.60%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	671,600	5.60%	671,600	5.60%



Sl. No.	Name of promoter	Share holding at the beginning of the Year		Cumulative Share holding during the year	
		No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
9	M. Byju (On behalf M/s. St. Peter & Paul)				
	At the beginning of the year	500,000	4.17%	500,000	4.17%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	500,000	4.17%	500,000	4.17%
10	M. Byju (On behalf M/s. Allied Exim Foods)				
	At the beginning of the year	250,000	2.08%	250,000	2.08%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	250,000	2.08%	250,000	2.08%
11	M. Anees				
	At the beginning of the year	300,000	2.50%	300,000	2.50%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	300,000	2.50%	300,000	2.50%
12	M. Anees (On behalf M/s. St. Peter & Paul)				
	At the beginning of the year	500,000	4.17%	500,000	4.17%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	500,000	4.17%	500,000	4.17%
13	M. Anees (On behalf M/s. Allied Exim Foods)				
	At the beginning of the year	250,000	2.08%	250,000	2.08%
	Date wise increase in Promoters Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Promoters Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	250,000	2.08%	250,000	2.08%

(iii) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters & Holders of GDRs & ADRs)					
Sl. No.	Name of the Shareholder	Share holding at the beginning of the Year		Cumulative Share holding during the year	
		No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
	At the beginning of the year				
	Date wise increase/decrease in Promoters Share holding during the year specifying the reasons for increase/decrease (e.g. allotment/transfer/bonus/sweat equity etc)	NA			
	At the end of the year				



(v) SHAREHOLDING OF DIRECTORS & KMP					
Sl. No.	Name of Director	Share holding at the beginning of the Year		Cumulative Share holding during the year	
		No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
1	Joseph Jegan Mozrais				
	At the beginning of the year	6,718,400	55.99%	6,718,400	55.99%
	Date wise increase in Director's Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Director's Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	6,718,400	55.99%	6,718,400	55.99%
Sl. No.	Name of the Director	Share holding at the beginning of the Year		Cumulative Share holding during the year	
2	Muraies Mohan	No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
	At the beginning of the year	1,985,000	16.54%	1,985,000	16.54%
	Date wise increase in Director's Share holding during the year specifying the reasons for increase (e.g. allotment)	No Changes			
	Date wise decrease in Director's Share holding during the year specifying the reasons for decrease (e.g. transfer)				
	At the end of the year	1,985,000	16.54%	1,985,000	16.54%



V INDEBTEDNESS					
Indebtedness of the Company including Interest outstanding/accrued but not due for payment					
Sl. No.	Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
1	Indebtedness at the beginning of the financial year				
	(i) Principal Amount	385,757,379	84,243,841	-	470,001,220
	(ii) Interest due but not paid	0	0	-	0
	(iii) Interest accrued but not due	0	0	-	0
	Total (i+ii+iii)	385,757,379	84,243,841	-	470,001,220
2	Change in Indebtedness during the financial year				
	Additions	70,010,431	30,661,774	-	100,672,205
	Reduction	0	0	-	0
	Net Change	70,010,431	30,661,774	-	100,672,205
3	Indebtedness at the end of the financial year				
	(i) Principal Amount	455,767,810	114,905,615	-	570,673,425
	(ii) Interest due but not paid	-	-	-	-
	(iii) Interest accrued but not due	-	-	-	-
	Total (i+ii+iii)	455,767,810	114,905,615	-	570,673,425

VI REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL						
<b>A. REMUNERATION TO MANAGING DIRECTOR, WHOLE TIME DIRECTOR AND/OR MANAGER:</b>						
Sl.No.	Particulars of Remuneration	Name of the MD/WTD/Manager			Total Amount	
1	Gross salary					
	(a) Salary as per provisions contained in section 17(1) of the Income Tax 1961.	-	-	-	-	
	(b) Value of perquisites u/s 17(2) of the Income tax Act, 1961	-	-	-	-	
	(c) Profits in lieu of salary under section 17(3) of the Income Tax Act, 1961	-	-	-	-	
2	Stock option	-	-	-	-	
3	Sweat Equity	-	-	-	-	
4	Commission	-	-	-	-	
	as % of profit	-	-	-	-	
	others (specify)	-	-	-	-	
5	Others, please specify	-	-	-	-	
	Total (A)	-	-	-	-	
	Ceiling as per the Act	NA				
<b>B. REMUNERATION TO OTHER DIRECTORS:</b>						
Sl.No.	Particulars of Remuneration	Joseph Jegan	M.Mohan		Total Amount	
1	Independent Directors					
	(a) Fee for attending board committee meetings	-	-	-	-	
	(b) Commission	-	-	-	-	
	(c) Others, please specify	-	-	-	-	
	Total (I)	0	0	-	0	
2	Other Executive Directors					
	(a) Salary	1,200,000	960,000	-	2,160,000	
	(b) Commission	-	-	-	-	
	(c) Others, please specify.	-	-	-	-	
	Total (2)	1,200,000	960,000	-	2,160,000	
	Total (II)=(1+2)	1,200,000	960,000	-	2,160,000	
	Total Managerial Remuneration	1,200,000	960,000	-	2,160,000	
	Overall Ceiling as per the Act.	NA				
<b>C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD:</b>						
Sl. No.	Particulars of Remuneration	Key Managerial Personnel				
1	Gross Salary	CRO	Company Secretary	CFO	Others	Total
	(a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961.	-	1,20,000	-	-	-
	(b) Value of perquisites u/s 17(2) of the Income Tax Act, 1961	-	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) of the Income Tax Act, 1961	-	-	-	-	-
2	Stock Option	-	-	-	-	-
3	Sweat Equity	-	-	-	-	-
4	Commission	-	-	-	-	-
	as % of profit	-	-	-	-	-
	others, specify	-	-	-	-	-
5	Others, please specify	-	-	-	-	-
	Total	-	1,20,000	-	-	-



VII	PENALTIES/PUNISHMENT/COMPOUNDING OF OFFENCES				
Type	Section of the Companies Act	Brief Description	Details of Penalty/Punishment/Compounding fees imposed	Authority (RD/NCLT/Court)	Appeal made if any (give details)
<b>A. COMPANY</b>					
Penalty					
Punishment					
Compounding					
<b>B. DIRECTORS</b>					
Penalty					
Punishment					
Compounding					
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty					
Punishment					
Compounding					



DATE: 02/12/2020  
PLACE: CHENNAI

For and on Behalf of the Board of Directors of  
ST.PETER & PAUL SEA FOOD EXPORTS PRIVATE LIMITED

*[Signature]*  
JOSEPH JEGAN MORRAIS  
DIRECTOR  
DIN: 03354679

*[Signature]*  
MURAIES MOHAN  
DIRECTOR  
DIN: 03360630